

EXHIBIT 8

**REDACTED VERSION
OF DOCUMENT
SOUGHT TO BE SEALED**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC

Plaintiff,

vs.

Case No. 17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;
OTTOMOTTO, LLC; OTTO
TRUCKING LLC,

Defendants.

****HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY****

VIDEO DEPOSITION OF GERARD DWYER

Palo Alto, California

Wednesday, August 9, 2017

Volume I

REPORTED BY:

REBECCA L. ROMANO, RPR, CSR No. 12546

JOB NO. 2671230

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10:19:33

1 a minimum is once per year.

2 Q. You stated that the [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 A. At least once per year.

10:20:02

6 Q. Is that valuation done internally or is
7 it outsourced to a third party?

8 MR. EISEMAN: Objection as to form.

9 THE DEPONENT: The operating agreement

10 allows for [REDACTED]

[REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 Q. (By Ms. Chang) Since you have been Waymo

10:20:37

16 CFO, how many [REDACTED]

17 A. One.

18 Q. When was that [REDACTED]

19 A. In Q4 2016.

20 Q. Are you -- do you know who conducted [REDACTED]

[REDACTED]

21 [REDACTED]?

22 A. [REDACTED] was overseen by

23 Jeff Kouchakji, who is the director in M&A finance.

24 Q. How do you spell Mr. Kouchakji's name?

25 A. I get this wrong, but it's

10:21:19

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10:21:21

1 K-O-U-C-H-A-K-J-I, something close to that.

2 Q. You stated that Mr. Kouchakji oversaw the

3 [REDACTED].

4 Do you know if he conducted [REDACTED]

5 [REDACTED] [REDACTED]

6 [REDACTED]

7 A. My understanding is he conducted a -- an

8 internal review, but also engaged the services of

9 PricewaterhouseCoopers.

10 Q. Were there documents that were generated

10:22:06

11 as a result of [REDACTED]

12 MR. EISEMAN: Objection as to form.

13 THE DEPONENT: Yes. There was a document

14 produced at the end of that process.

15 Q. (By Ms. Chang) You stated that there was

10:22:29

16 both an internal review as well as a review by

17 PricewaterhouseCoopers.

18 A. Uh-huh.

19 Q. Do you know if there were two separate

20 documents that were generated or if it was one

10:22:41

21 single document?

22 A. I don't know.

23 Q. Do you know what [REDACTED]

24 [REDACTED]

25 A. I do.

10:22:56

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10:22:56

1 Q. What was that valuation?

2 A. [REDACTED]

3 Q. What was your role in [REDACTED]

4 [REDACTED]

5 A. My role was to provide the [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 Q. Is the [REDACTED]

10 [REDACTED]

10:23:42

11 A. No.

12 Q. When is the next scheduled valuation?

13 A. [REDACTED]

14 Q. [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED].

20 Q. Will Mr. Kouchakji be in charge of the

10:24:27

21 [REDACTED]?

22 A. I don't know for sure, but I expect so.

23 Q. Do you know if PricewaterhouseCoopers

24 will be retained [REDACTED]?

25 A. I don't know.

10:24:45

1 I, Rebecca L. Romano, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath;
8 that a record of the proceedings was made by me
9 using machine shorthand which was thereafter
10 transcribed under my direction; that the foregoing
transcript is true record of the testimony given.

11 Further, that if the foregoing pertains to the
12 original transcript of a deposition in a Federal
13 Case, before completion of the proceedings, review
14 of the transcript [] was [X] was not requested.

15 I further certify I am neither financially
16 interested in the action nor a relative or employee
17 of any attorney or any party to this action.

18 IN WITNESS WHEREOF, I have this date
19 subscribed my name.

20 Dated: August 10, 2017

21
22
23 
24

25 Rebecca L. Romano, RPR,
CSR. No 12546